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December 13, 2019

Marlene H. Dortch Secretary, Federal Communications Commission 445 12<sup>th</sup> Street, SW Washington, DC 20554

Re: Expanding Flexible Use of the 3.7 to 4.2 GHz Band, GN Docket No. 18-122

Dear Ms. Dortch:

On December 11, 2019, Greg Romano and I, along with Bryan Tramont and Adam Krinsky of Wilkinson Barker Knauer, LLP, met with Commissioner Brendan Carr and his legal advisor Will Adams to discuss the above-referenced proceeding.

During the meeting, Verizon raised the public interest importance of moving swiftly on repurposing and clearing 280 megahertz in the C-band for new 5G services. We commended recent statements calling for an FCC auction in 2020 and urged swift action so that the auction be conducted (and the spectrum repurposed) in the same timeframe as would have occurred with a private auction: an auction as early as possible in 2020 and clearing within the 18-36 month clearing timeframes expressed in the record. We also discussed the process for clearing incumbent operations from the lower 300 megahertz of the C-band (280 megahertz for 5G and 20 megahertz for guard-band). In doing so, we discussed the Commission's core spectrum management responsibilities and its long-standing "Emerging Technologies" principles that include winning bidder payments to incumbents to clear repurposed spectrum in an expedited manner. We emphasized that the Commission should identify appropriate incentives for clearing and penalties for failing to meet its benchmarks and deadlines.

Sincerely,

William H. Johnson

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cc: Commissioner Carr Will Adams